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Serial Number 10/714,626

AMENDMENTS TO DRAWINGS

Please amend Figs. 1 and 2 to include the label –Prior Art–, as indicated in the attached
REPLACEMENT SHEET.

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REMARKS

Reconsideration of the application is respectfully requested for the following reasons:

1. Amendments to Claims, Specification, and Drawings

Claim 1 has been amended to correct a typographic error, by changing "whereof" to -thereof-.

The specification has been amended to complete sentence fragments on page 10.

Finally, Figs. 1 and 2 have been amended to include the label -Prior Art-, as required on page 2 of the Official Action.

Because the changes are all formal in nature, it is respectfully submitted that the changes do not involve new matter.

2. Rejection of Claims 1, 2, 4-9, and 11-14 Under 35 USC §103(a) in view of U.S. Patent Publication No. 2002/0151307 (Demarez) and Admitted Prior Art

This rejection is respectfully traversed on the grounds that the Demarez publication neither discloses nor suggests an island type mobile communication arrangement in which, while entering an island:

- the cellular phone asks the island MSC (e.g., GSM) to update location, as recited in lines 9-11 of claim 1; and
- upon completion of location updating, the island VLR records the MSISDN of the cellular phone, as recited in lines 13-16 of claim 1, and

on the grounds that the positively recited location updating and recordation of the MSISDN by the island VLR is not admitted to be prior art. In fact, the Demarez publication does not disclose any sort of island ETUs connected to island BSCs and island MSCs, as claimed, for carrying out the location updating function.

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To the contrary, the cell of the Demarez publication do not support the type of GPRS services claimed, which are configured only on a local area (LA) basis. Instead, Demarez teaches two modes of paging operation, in the second of which a paging request is issued with a routing area (RA) identity attached, to any base station controller (BSS) serving the current RA, so that the BSS can page the RA cells and non-"GPRS" cells (which do not recognize the RA identifier) within the LA area of the RA cell. The "SGSN" that issues the paging request also obtains information concerning other BSS's serving the LA, which are instructed to issue paging requests. By attaching the RA identifier to the command, the other BSS's will, since they do not recognize the RA identifier, page only non-GPRS cells. It is respectfully submitted that these non-GPRS cells are therefore different from the island BTSs of the claimed invention.

Unlike the BSSs of Demarez, which the Examiner equates to the claimed BTS, the island BTSs 39, 49, and 59 of the present invention are island type mobile communication arrangements coupled to an island MSC and island VLR. In particular, as described in the present specification, BTSs 33, 43, and 53 are reassigned as island BTSs 39, 49, and 59 respectively, which are coupled to an island BSC 66, but are not coupled to the BSCs 60, 62, and 64 respectively. Furthermore, an LAI corresponding to the island BTSs 39, 49, and 59 is assigned thereto.

As shown in Fig. 3, the island BTSs 39, 49, and 59 are separated. The island BSC 66 is coupled to an island MSC 85, and the island MSC 85 is coupled to an island VLR 67. All cells covered by the BTSs 30, 31, 32, 34, and 35 correspond to LA1 and are assigned to a particular LAI for communicating with cellular phones. Likewise, all cells covered by the BTSs 40, 41, 42, 44, and 45 correspond to LA2 and are assigned to a particular LAI for communication with cellular phones. Still further, all cells covered by the BTSs 50, 51, and 52 correspond to LA3 and are assigned to a particular LAI for communicating with cellular phones, while all island cells covered by the island BTSs 39, 49, and 59 correspond to island LA and are assigned to a particular LAI in which the island BTSs 39, 49, and 59 communicate with cellular phones. The functionality of the island BSC 66 is therefore the same as that of each of the BSCs 60, 62, and

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64. Similarly, the functionality of the island VLR 67 is the same as that of each of the VLRs 61, 63, and 65.

As a result, it can be seen that the present invention, unlike the system of Demarez, does not change the GSM framework of the prior art to reassign BTSs as island BTSs respectively and to add an island BSC, and that the island BTSs are coupled to an island BSC, which permits the cellular phone to ask GSM to update the position and record the mobile station integrated services digital networks (MSISDN) of the cellular phone in the island VLR while entering into the island LA from LA1, which is not possible with the network of Demarez. Consequently, it is respectfully submitted that the Demarez patent, whether or not considered in light of the admitted prior art, neither anticipates nor suggests the claimed invention, and withdrawal of the rejection of claims 1, 2, 4-9, and 11-14 under 35 USC §103(a) is respectfully requested.

3. Rejection of Claims 3 and 10 Under 35 USC §103(a) in view of U.S. Patent Publication Nos. 2002/0151307 (Demarez) and 2004/0121818 (Paakkonen), and Admitted Prior Art

This rejection is respectfully traversed on the grounds that the Paakkonen publication, like the Demarez publication, neither discloses nor suggests an island type mobile communication arrangement in which the cellular phone asks the island MSC (*e.g.*, GSM) to update location when entering an island and, upon completion of location updating, the island VLR records the MSISDN of the cellular phone, as recited in claim 1. The Paakkonen publication is directed to a multimedia messaging service that provides ringing images on mobile calls, and does not disclose any sort of island type communication arrangement. As a result, withdrawal of the rejection of claims 3 and 10 under 35 USC §103(a) is respectfully requested.

Having thus overcome each of the rejections made in the Official Action, withdrawal of the rejections and expedited passage of the application to issue is requested.

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Respectfully submitted,

BACON & THOMAS, PLLC

A handwritten signature in black ink, appearing to be 'B E Urcia', with a long horizontal line extending to the right.

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Date: August 7, 2006

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PRINTED BY: BACON & THOMAS, PLLC